



March 21, 2023

**VIA ECF**

U.S. Magistrate Judge Andrew M. Edison  
United States Courthouse  
601 Rosenberg, Seventh Floor  
Galveston, TX 77550

Re: No. 4:21-cv-00575, *In re Plymouth County Retirement Sys. v. Apache Corp., et al.*

Dear Judge Edison:

Pursuant to the Court's Docket Control Order, Dkt. 86, and the Court's March 2, 2023 Minute Order,<sup>1</sup> the Plymouth County Retirement System ("Plymouth County") and the Trustees of the Teamsters Union No. 142 Pension Fund ("Teamsters 142") (collectively, "Lead Plaintiffs") and Defendants Apache Corporation ("Apache"), John J. Christmann, IV, Timothy J. Sullivan, and Stephen J. Riney (collectively, "Defendants" and, together with Lead Plaintiffs, the "Parties") provide the Court with this second update concerning the status of their efforts to agree to a Search Protocol pertaining to Defendants' document production in this matter.

Since submitting their March 1, 2023 Status Report addressing their efforts to agree upon a Search Protocol, the Parties have engaged in continued negotiations but have not yet reached agreement and would benefit from a limited additional period of time in which to attempt to reach agreement or else define for the Court the matters still in dispute. The Parties, therefore, jointly request that they be permitted to continue good faith negotiations until March 31, 2023, at which point they will report their agreement to the Court or present to the Court for resolution any remaining disputed issues.

Respectfully submitted,

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<sup>1</sup> The Docket Control Order requires, among other things, that within thirty (30) days of Defendants' responses and objections to Plaintiffs' Requests, the Parties must agree to a search protocol ("Search Protocol") or present to the Court any disputed issues pertaining to a Search Protocol. In its March 2, 2023 Minute Order, the Court granted the Parties request to submit a status report by March 21, 2023 addressing their continuing efforts to agree upon a Search Protocol.



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